

**San Joaquin Solar 1 & 2 Hybrid Project
Supplemental Information
In Response to CEC Data Adequacy Requests
08-AFC-12**

TECHNICAL AREA: AIR QUALITY

Data Adequacy Request 1: Please provide a letter of completeness from San Joaquin Valley Air Pollution Control District. Application forms have not been filed with SJVAPCD. SJVAPCD Rule 2201, Section 5.8.3 requires the District to notify the CEC of completeness within 20 days of receipt of the AFC.

Response: The air permit application package (Authority To Construct (ATC)) was received by the San Joaquin Valley Air Pollution Control District (SJVAPCD) on January 21, 2009. SJVAPCD is reviewing the application and preparing a letter of completeness for the ATC. Once the permit application review has been completed, SJVAPCD will send CEC and the applicant a letter of completeness.

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TECHNICAL AREA: AIR QUALITY

Data Adequacy Request 2: List of potential offset sources including the location of the offset sources and quantity of reductions.

Response: Response to this data adequacy request will be submitted separately under confidential cover.

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TECHNICAL AREA: AIR QUALITY

Data Adequacy Request 3: Please provide a description of mitigation proposed for particulate matter less than 2.5 microns ($PM_{2.5}$) because it is a pollutant that currently exceeds the ambient air quality standards but is not subject to offset requirements under the new source review rule.

Response: SJS 1&2 will obtain ERCs to offset the project related PM_{10} emissions. Since particulate matter less than 2.5 microns ($PM_{2.5}$) constitutes a portion of the particulate matter less than 10 microns (PM_{10}), it is the goal of SJS 1&2 to obtain PM_{10} ERCs that contained approximately the same portion of $PM_{2.5}$ emissions as the Project is anticipated to emit. Thus these PM_{10} ERCs should also offset the Project related $PM_{2.5}$ emissions.

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TECHNICAL AREA: ALTERNATIVES

Data Adequacy Request 1: Please provide a discussion of an air cooling alternative.

Response: An alternate means of process cooling for SJS 1&2 is air cooling. The table below summarizes the heat balance and resulting efficiencies of air cooling and wet cooling alternatives. As shown in the table, air cooling is less efficient than wet cooling.

	Energy generated (KW)	Parasitic Load (KW)	Net Power to Grid (KW)	Heat required to generate energy (btu/hr)	Net Heat rate (Btu/KW-hr)	Theoretical Heat Rate (Btu/KW-hr)	Efficiency
Daytime Solar Wet Cooling	60,200	6,800	53,400	568,881,627	10,653	3,413	32.0%
Daytime Solar Dry Cooling	60,855	7,455	53,400	614,763,252	11,512	3,413	29.6%
Nighttime Biomass Wet cooling	49,240	9,240	40,000	590,381,812	14,760	3,413	23.1%
Nighttime Biomass Dry cooling	49,655	9,655	40,000	636,263,980	15,907	3,413	21.5%

The installed cost of dry (air cooled) condensers for SJS 1&2 is approximately \$26,800,000. The installed cost of wet (water cooled) condensers for the Project is approximately \$13,660,000. The dry cooling alternative would result in a net increased equipment cost of \$13,140,000, which is nearly double the capital investment of wet cooling.

The dry cooling alternative would require air cooling of the power plant auxiliaries. Standard design for cooling water temperature for power plant equipment (heat exchangers, coolers, etc.) is 90°F. An air cooler will produce approximately 143°F cooling water when the outside temperature is 103°F (dry bulb), which is a typical summertime temperature at the project site. The high cooling water temperature of 143°F will require redesign of the power plant auxiliaries at an undetermined cost. Additionally, acceptance of the higher cooling water temperature from the biomass equipment manufacturer is required for equipment performance guarantees.

In summary, due to the lower energy efficiency, increased equipment and operating cost, and undetermined redesign required by air cooling, this alternative was eliminated.

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TECHNICAL AREA: ALTERNATIVES

Data Adequacy Request 2: Fig. 4.2.2 – The light blue shaded parcels are not identified in the legend.

Response: The light blue shaded parcels are parcels which are currently in a Williamson Act Contract. A revised Figure 4.2-2 is attached.

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TECHNICAL AREA: ALTERNATIVES

Data Adequacy Request 3: Please provide a preferred alternative and alternate for the transmission route.

Response: The preferred transmission route from SJS1&2 to the Gates substation is the southern route. PG&E's Land Department and Transmission Line Asset Strategy Group investigation has determined the existing easement rights along Jayne Avenue (the northern route) can only operate and maintain a wood pole type installation at 70KV transmission circuit voltage. PG&E's easement rights are limited in scope, and do not authorize use of the property for additional facilities that will be installed and maintained by a third party. As such, SJS 1 & 2 will secure necessary land rights along the proposed southern route, separate from those currently held by PG&E. Additionally, the southern route is a more direct route from the plant substation to the Gates Substation, according to the current SJS 1 & 2 configuration. The southern route ROW would have less of an impact on surrounding agricultural activities than adding capacity to the northern PG&E route since the proposed southern route follows an existing County service road eliminating the need to construct access roads. Additionally, the southern route would have less impact on businesses located on the East side of I-5 than the current PG&E ROW.

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TECHNICAL AREA: BIOLOGICAL RESOURCES

Data Adequacy Request 1: Please provide a discussion of direct, indirect, and cumulative impacts to biological resources from construction, operation, and maintenance of the project.

Response: Direct and indirect impacts to the Project site, as discussed in the AFC, will include direct loss of 640 acres of actively cultivated land which supports marginal foraging for some special-status species in the Project vicinity. These impacts include all phases of the Project including construction, operation, and maintenance.

While the locations of impacts have not been spatially determined, direct, permanent impacts resulting from installation of approximately 25-30 poles for the proposed 6-mile transmission line are estimated to total 1.72 acres of vegetation disturbance. Temporary impacts are estimated at approximately 1.38 acres. The poles will be sited so that they will span any habitats that may potentially support special status species, as well as the jurisdictional waters and any associated riparian vegetation associated with Zapato Chino Creek. Operation and maintenance activities associated with the Project are not anticipated to cause significant direct or indirect impacts to habitats within the transmission line alignment.

Potential cumulative impacts to biological resources caused by the construction of two solar hybrid power plants on the 640-acre SJS 1&2 Site will include loss of active croplands (orchards). However, because the adjacent vicinity is either disturbed grassland and valley saltbush scrub habitat or existing intensive agricultural use, this loss is not expected to result in significant cumulative impacts to biological resources in the project area. No significant disruption to wildlife movement is expected.

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TECHNICAL AREA: BIOLOGICAL RESOURCES

Data Adequacy Request 2: Please provide information for sensitive species and habitats on the project site in addition to species on the transmission line route.

Response: The Project site is under active intensive cultivation (orchards) and is continually cultivated and harvested. Therefore, it was found to not contain habitat that is suitable to support sensitive species. CDFG staff agreed that surveys for special-status species were not necessary due to the lack of habitat within the 640 acre site. However, it can be assumed that raptors detected along the transmission line and within the 1-mile assessment buffer of the Project may use the Project site as marginal forage habitat.

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TECHNICAL AREA: BIOLOGICAL RESOURCES

Data Adequacy Request 3: Please provide a list of species actually observed during field surveys on the project site and transmission line route.

Response: Separate lists of wildlife species and plant species that were observed in the survey area (including the Project site and transmission line routes and 1-mile assessment area) can be found in the AFC Appendices F-4 and F-5. The title pages of these appendices contained errors, and may have been misleading; however, the lists provided are those species actually observed during field surveys in 2008 and 2009. Appendix F-2 lists those species with POTENTIAL to occur, but also identifies if the species was observed during site and transmission line surveys.

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TECHNICAL AREA: BIOLOGICAL RESOURCES

Data Adequacy Request 4: Please provide a map of the field survey area that labels where biological surveys were conducted.

Response: Biological surveys were conducted in all areas of the Project; however, focused surveys for special-status species were not conducted on the Project site due to the current level of disturbance and lack of suitable habitat. Focused rare plant surveys and BNLL surveys will occur in Spring 2009 on the proposed southern transmission line alignment. Results of small mammal trapping in suitable habitat along both transmission lines are provided in the appendices of the attached biological technical resources report.

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TECHNICAL AREA: BIOLOGICAL RESOURCES

Data Adequacy Request 5: Please provide an aerial photo or wetlands delineation map at a scale of 1:2,400 showing potential jurisdictional and non-jurisdictional wetlands.

Response: Figures showing state-jurisdictional waters are provided in the attached Biological Resources Technical Report. No wetlands are present in the Project survey area.

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Data Adequacy Request 6: Please provide a discussion of the biological resources at the proposed project site by conducting a survey of the project site and within 1 mile of the project site. Provide the results of the December 2008 small mammal trapping survey.

Response: The area within 1 mile of the Project site was surveyed during the 2008 survey season. The habitat that is present within this area is displayed on Figure 5.6-2, and biological resources within 1 mile of the Project area are also displayed and discussed in the AFC.

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TECHNICAL AREA: BIOLOGICAL RESOURCES

Data Adequacy Request 7: Please provide the results of the 2009 transmission line field surveys.

Response: Results of 2009 surveys (Protocol BNLL surveys and focused rare plant surveys) will be provided upon completion of the surveys. Note that the BNLL surveys require 2 survey periods, the second of which is juvenile surveys that ends September 15. Results of adult BNLL surveys will be provided as soon as possible after the adult survey period in July 2009.

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TECHNICAL AREA: BIOLOGICAL RESOURCES

Data Adequacy Request 8: Please provide a list of species observed onsite and within 1 mile of the project site.

Response: Please see responses to Data Adequacy Requests 2, 3, 4, and 6 within the Biological Resources Technical Area.

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TECHNICAL AREA: BIOLOGICAL RESOURCES

Data Adequacy Request 9: Please provide copies of the CNDDDB records and field survey forms for all special status species found.

Response: CNDDDB records are provided in the attached Biological Resources Technical Report.

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TECHNICAL AREA: BIOLOGICAL RESOURCES

Data Adequacy Request 10: Please conduct and provide results of current biological surveys onsite and within a 1 mile buffer of the site including, the December 2008 small mammal trapping survey, and the 2009 transmission line survey.

Response: Please see responses to Data Adequacy Requests 2, 3, 4 and 6 within the Biological Resources Technical Area. The results of the small mammal trapping survey are provided in the attached biological technical resources report. Results of the 2009 surveys will be provided as soon as possible after completion of the surveys.

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TECHNICAL AREA: BIOLOGICAL RESOURCES

Data Adequacy Request 11: Please provide the Army Corps of Engineers wetland delineation forms and/or determination of wetland status.

Response: Wetland delineation forms and determination are provided in the attached Biological Resources Technical Report.

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TECHNICAL AREA: BIOLOGICAL RESOURCES

Data Adequacy Request 12: Please provide an impact assessment for the project site. Provide information on impacts of the project pertaining to project site preparation, construction, operations, and maintenance activities.

Response: Please see response to Data Adequacy Request 1 within the Biological Resources Technical Area.

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TECHNICAL AREA: BIOLOGICAL RESOURCES

Data Adequacy Request 13: Please provide a discussion of air emission impacts to biological resources.

Response: Impacts to biological resources as a result of air emissions are not anticipated to be significant. None of the special-status species or habitats in the study area are known to be sensitive to emissions or air pollution. All emissions of non-attainment pollutants and their precursors will be offset through mitigation for air quality impacts identified in Section 5.2 of the AFC. Although the SJS 1&2 will contribute to cumulative increases in air emissions, direct and cumulative impacts on biological resources associated with these increases are expected to be less than significant.

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TECHNICAL AREA: BIOLOGICAL RESOURCES

Data Adequacy Request 14: Please identify contacts made regarding offsite habitat compensation and management.

Response: No contacts have been made at this time regarding offsite habitat compensation.

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TECHNICAL AREA: BIOLOGICAL RESOURCES

Data Adequacy Request 15: Please submit copies of preliminary correspondence regarding the proposed project with the USFWS, CDFG, USACE, and RWQCB.

Response: Records of correspondence with CDFG and USFWS are attached. USACE and RWQCB have not been contacted because it is expected that the transmission line will span the creek; therefore, impacts to the jurisdictional waters are not anticipated. Correspondence with RWQCB and USACE will be provided as it occurs.

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TECHNICAL AREA: BIOLOGICAL RESOURCES

Data Adequacy Request 16: Please provide contact information for USACE, RWQCB, and Fresno County.

Response: No contact information is available with respect to this project at this time. See response to Data Adequacy Request 15 within the Biological Resources Technical Area.

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TECHNICAL AREA: HAZARDOUS MATERIALS HANDLING

Data Adequacy Request 1: Please provide a discussion of how facility closure will be accomplished in the event of premature or unexpected cessation of operations.

Response: Per conversation with Rick Tyler this Data Adequacy Request is no longer needed.

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TECHNICAL AREA: NOISE

Data Adequacy Request 1: Please identify agencies, such as the appropriate office(s) of the Fresno County Government, that would have permit authority were it not for the Energy Commission's exclusive jurisdiction.

Response: William M. Kettler
Principal Staff Analyst
Fresno County Department of Public Works and Planning
Development Services Division
2220 Tulare Street, Suite A
Fresno, CA 93721
559.262.4242

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TECHNICAL AREA: NOISE

Data Adequacy Request 2: Please identify officials of the Fresno County Government who were contacted, and who will serve as a contact person for Energy Commission staff.

Response: William M. Kettler
Principal Staff Analyst
Fresno County Department of Public Works and Planning
Development Services Division
2220 Tulare Street, Suite A
Fresno, CA 93721
559.262.4242

Steve Baker, P.E.
California Energy Commission
Facility Siting Division
1516 9th Street, MS46
Sacramento, CA 95814
916.654.3915

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TECHNICAL AREA: PROJECT OVERVIEW

Data Adequacy Request 1: Please identify the preferred transmission route, or state whether the application is seeking certification for both route options.

Response: The preferred transmission route from SJS1&2 to the Gates substation is the southern route. PG&E's Land Department and Transmission Line Asset Strategy Group investigation has determined the existing easement rights along Jayne Avenue (the northern route) can only operate and maintain a wood pole type installation at 70KV transmission circuit voltage. PG&E's easement rights are limited in scope, and do not authorize use of the property for additional facilities that will be installed and maintained by a third party. As such, SJS 1 & 2 will secure necessary land rights along the proposed southern route, separate from those currently held by PG&E. Additionally, the southern route is a more direct route from the plant substation to the Gates Substation, according to the current SJS 1 & 2 configuration. The southern route ROW would have less of an impact on surrounding agricultural activities than adding capacity to the northern PG&E route since the proposed southern route follows an existing County service road eliminating the need to construct access roads. Additionally, the southern route would have less impact on businesses located on the East side of I-5 than the current PG&E ROW.

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TECHNICAL AREA: PROJECT OVERVIEW

Data Adequacy Request 2: Please provide a full-page color photographic reproduction depicting the visual appearance of the site prior to construction.

Response: A full-page color photograph of the site prior to construction is attached as Figure 3.4-2a.

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TECHNICAL AREA: PROJECT OVERVIEW

Data Adequacy Request 3: Please describe the constraints and potential impacts of the transmission line route alternatives, and the selection process in determining the preferred transmission line route.

Response: The preferred transmission route from SJS 1&2 to the Gates substation is the southern route. PG&E's Land Department and Transmission Line Asset Strategy Group investigation has determined the existing easement rights along Jayne Avenue (the northern route) can only operate and maintain a wood pole type installation at 70KV transmission circuit voltage. PG&E's easement rights are limited in scope, and do not authorize use of the property for additional facilities that will be installed and maintained by a third party. As such, SJS 1 & 2 will secure necessary land rights along the proposed southern route, separate from those currently held by PG&E. Additionally, the southern route is a more direct route from the plant substation to the Gates Substation, according to the current SJS 1 & 2 configuration. The southern route ROW would have less of an impact on surrounding agricultural activities than adding capacity to the northern PG&E route since the proposed southern route follows an existing County service road eliminating the need to construct access roads. Additionally, the southern route would have less impact on businesses located on the East side of I-5 than the current PG&E ROW.

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TECHNICAL AREA: RELIABILITY

Data Adequacy Request 1: Please provide projected availability factor for both solar and biomass components, and estimated capacity factor for solar component.

Response: The SJS 1&2 solar component is projected to be available for 96% of daylight hours. The biomass component is projected to have an availability factor of 96%. These availability factors are based on one week of scheduled facility shutdown and one week of unscheduled shutdown each year.

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TECHNICAL AREA: SOCIOECONOMICS

Data Adequacy Request 1: Please provide an estimate of sales taxes generated during construction and separately during an operational year of the project.

Response: The Project's initial capital cost is estimated to be approximately \$485 million. To the extent possible, the Project will purchase materials locally. Currently, the estimated value of materials and supplies purchased within Fresno County during the construction phase is approximately \$23,750,000.

The estimated annual Project operations and maintenance (O&M) budget is \$10,020,000. The estimated value of operational expenditures within Fresno County is \$1.5 million for locally purchased materials.

At a sales tax rate of 7.975% the revenue generated during construction is estimated as \$1,894,063 for the project, or \$1,262,708/yr.

The tax revenue generated per year during operations is estimated to be \$119,625/yr.

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TECHNICAL AREA: SOIL

Data Adequacy Request 1: Please provide a map of the site and surrounding area at a scale of 1:24,000

Response: Requested map is attached as Figure 5.4-2.

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TECHNICAL AREA: SOIL

Data Adequacy Request 2: Please provide a discussion of the location of any proposed fill disposal or fill procurement (borrow) sites

Response: There are no proposed offsite disposal or fill procurement (borrow) sites. It is anticipated that the site grading will be balanced onsite.

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TECHNICAL AREA: SOIL

Data Adequacy Request 3: Please provide a schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.

Response:

**Table 5.4-6 (Revised)
Applicable Permits**

Responsible Agency	Permit/Approval	Schedule
Regional Water Quality Control Board Colorado River Basin Region 7	Notice of Intent	Apply for application at least 60 days prior to construction.
	National Pollutant Discharge Elimination System General Construction Storm Water Permit	Complete initial Construction SWPPP SWPPP and file Notice of Intent with SWRCB 60 days before operation. Submit copy of SWPPP and Notice of Intent to CEC 30 days before operation (or letter from RWQCB exempting the Project from NPDES Industrial Permit requirements).
Fresno County	Grading Permit, Construction Permit	Apply for application at least 90-120 days prior to construction. Receive permit prior to construction
	Development Permit Requirements to be met	Apply for application at least 90-120 days prior to construction. Receive permit prior to construction
	Septic Tank/Leach Field Permit	Apply for application at least 90-120 days prior to construction. Receive permit prior to construction

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TECHNICAL AREA: TRANSMISSION SYSTEM DESIGN

Data Adequacy Request 1: Submit Pole design diagrams (including deadend structures) for the 230 kV generator overhead tie line showing configuration of insulators and conductors (with conductor sizes and type), and height of the pole/structures.

Response: Requested diagrams are attached as Figures 3.4-11 and 3.4-12.

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TECHNICAL AREA: TRANSMISSION SYSTEM DESIGN

Data Adequacy Request 2: Submit a complete electrical one-line diagram (or resubmit Figure 3.4-6 with missing elements or sizes/ratings) of the proposed San Joaquin Solar 1 & 2 Hybrid (SJSH 1 & 2) project 230 kV switchyard showing all equipment for all new generators' interconnection with the switchyard along with their respective sizes and/or ratings as follows:

- i) Any bus duct connectors or overhead conductors or cables, 13.8 kV switchgear, buses, breakers & disconnect switches on the low side of each Generator step-up transformer (GSU),
- ii) The GSU and short overhead conductors and/or cables from the GSU to the switchyard with the configurations for the switchyard buses, breakers, disconnect switches on the 230 kV side, along with the proposed tie line transmission outlet from the switchyard.

Response: Revised Figure 3.4-6 is attached.

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TECHNICAL AREA: TRANSMISSION SYSTEM DESIGN

Data Adequacy Request 3: Provide a one-line electrical diagram showing the pre-project PG&E Gates 230 kV substation with the existing the transmission outlets along with the configurations for buses, breakers, disconnect switches, and their respective sizes and/or ratings.

Response: One-line diagrams of the PG&E Gates substation are maintained by PG&E. The applicant has requested such drawings, but has not been able to obtain access to them. Copies of email communication with PG&E are attached.

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TECHNICAL AREA: TRANSMISSION SYSTEM DESIGN

Data Adequacy Request 4: Also provide a one-line electrical diagram showing the post-project Gates 230 kV substation with the proposed 230 kV generator tie line interconnection facilities for buses, breakers and disconnect switches and their respective sizes and/or ratings

Response: One-line diagrams of the PG&E Gates substation are maintained by PG&E. The applicant has requested information regarding post-project diagrams, but has been informed that such information will not be available until after the system impact study is complete. SJS 1&2 is in the first cluster of system impact studies which is projected to be complete in July 2009. Copies of email communication with PG&E are attached.

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TECHNICAL AREA: TRANSMISSION SYSTEM DESIGN

Data Adequacy Request 5: Provide a physical layout drawing of the post project Gates substation showing all major equipment and transmission outlets.

Response: Layout drawings of the PG&E Gates substation are maintained by PG&E. The applicant has been unable to obtain such drawings.

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TECHNICAL AREA: TRANSMISSION SYSTEM DESIGN

Data Adequacy Request 6: Select the preferred route of the proposed generator 230 kV overhead transmission tie line to the Gates substation and describe how the route is selected by comparing with any alternate routes and their environmental effects.

Response: The preferred transmission route from SJS 1&2 to the Gates substation is the southern route. PG&E's Land Department and Transmission Line Asset Strategy Group investigation has determined the existing easement rights along Jayne Avenue (the northern route) can only operate and maintain a wood pole type installation at 70KV transmission circuit voltage. PG&E's easement rights are limited in scope, and do not authorize use of the property for additional facilities that will be installed and maintained by a third party. As such, SJS 1 & 2 will secure necessary land rights along the proposed southern route, separate from those currently held by PG&E. Additionally, the southern route is a more direct route from the plant substation to the Gates Substation, according to the current SJS 1 & 2 configuration. The southern route ROW would have less of an impact on surrounding agricultural activities than adding capacity to the northern PG&E route since the proposed southern route follows an existing County service road eliminating the need to construct access roads. Additionally, the southern route would have less impact on businesses located on the East side of I-5 than the current PG&E ROW.

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TECHNICAL AREA: TRANSMISSION SYSTEM DESIGN

Data Adequacy Request 7: The following discrepancies were observed in the Large Generator Interconnection Study Agreement (LGISA) submitted materials:

- i) Whereas the LGISA dated October 24, 2008 was executed and signed between the California ISO and Martifer Renewables Solar Thermal LLC., all requirements for inclusion in the Transition Cluster Generator Queue position including payment of fees were fulfilled by the Bethel 7 & 8 Solar Hybrid project.
- ii) However, the AFC for the proposed San Joaquin Solar 1 & 2 Hybrid (SJSH 1 & 2) project to the Energy Commission was received from the applicant, San Joaquin Solar 1 LLC and San Joaquin Solar 2 LLC.

Please explain whether under the above circumstances the signed LGISA is still valid for the current proposed project and ownership, and as far as the generator California ISO queue position is concerned.

Response:

The “San Joaquin Solar 1&2” and “Bethel 7&8 Solar Hybrid” projects are the same project. The project owners have changed from Bethel Energy to Martifer Renewables Solar Thermal LLC between the time the initial Interconnection Request was filed in December 2007 and the start of the Phase I Interconnection Study (December 2008) – see information below for further details. In addition to the ownership change, the project’s name was also changed at the time the Acquisition Agreement was signed. The projects are now registered as: “San Joaquin Solar 1 LLC” and “San Joaquin Solar 2 LLC.” However, CAISO informed the applicant that the project name could not be changed in their records due to an accounting limitation (see attached email correspondence).

As summarized in the chart below, Bethel Energy LLC filed an Interconnection Request in December 2007 for the above named projects. Shortly after the Interconnection Feasibility Study Agreement was executed (between Bethel Energy LLC and CAISO), the projects were sold to “Eviva California Solar Holdings LLC,” a Martifer subsidiary, pursuant to an Acquisition Agreement, dated March 14, 2008. As a result of re-branding and re-organization efforts by Martifer in the U.S., the name of the acquiring entity (“Eviva California Solar Holdings LLC”) was subsequently changed to “Martifer Renewables Solar Thermal LLC”. Consent to Assignment documents were filed with CAISO in September 2008 to correct their records regarding project ownership prior to the execution of the LGIP agreement in October 2008. (See attached documents for reference) Details of the name changes and the relevant dates are in the following table:

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DATE	ACTION	REASON
12-December-2007	Interconnection request submitted to CAISO by "Bethel Energy LLC" for two projects named "Bethel 7&8"	
3-March-2008	Interconnection Feasibility Study Agreement signed between CAISO and "Bethel Energy LLC"	
14-March-2008	Acquisition Agreement signed in which "Bethel Solar Partners LLC" sold the two projects to "Eviva California Solar Holdings LLC," a Martifer subsidiary	Projects sold to Martifer in order to increase the financial capacity of the projects
28-April-2008	Amended Certificate of Registration executed in State of California to change the name of "Eviva California Solar Holdings LLC" to "Martifer Renewables Solar LLC"	Result of Martifer re-branding its efforts in North America
23-July-2008	Amended Certificate of Registration executed in State of California to change the name of "Martifer Renewables Solar LLC" to "Martifer Renewables Solar Thermal LLC"	Result of Martifer establishing different operating companies and organizational chart for their North American operations
25-September-2008	Executed two Consent to Assignment agreements with CAISO to update the project ownership to "Martifer Renewables Solar Thermal LLC" from "Bethel Energy LLC"	Update CAISO's records to reflect current project ownership, per events listed above
24-October-2008	LGIP Study Process Agreement executed between CAISO and "Martifer Renewables Solar Thermal LLC" for the project to be included in the Transition Cluster study starting 12/1/2008	

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TECHNICAL AREA: WASTE MANAGEMENT

Data Adequacy Request 1: Please provide a discussion of temporary or permanent closure in the event of premature or unexpected cessation of operations. AFC, Section 5.14.2.3, refers to a facility closure plan that is not included in the document.

Response: Facility Closure

Facility closure will be outlined in the facility's closure plan which will be prepared prior to operation of the facility. Closure of the facility may be temporary or permanent. Temporary closure would be for a period of time greater than the time required for normal maintenance. Reasons for temporary closure would include damage to the plant from earthquake, fire, storm, etc. Permanent closure would end plant operations with no intent to restart operations. The closure plan will outline steps to secure hazardous and non-hazardous materials and wastes. The plan will include monitoring the vessels and receptacles of materials or wastes, safe cessation of processes using hazardous materials or storing hazardous wastes and the inspection of secondary containment structures.

Temporary Closure

The facility's closure plan will outline measures for temporary closure that guarantee that all hazardous materials and waste will be removed from the facility, or that the site will have 24-hour security monitoring. The CEC will be notified prior to closure. Temporary contingency closure measures will be prepared as part of the facility closure plan prior to startup of the facility, and will be developed consistent with BMPs, the HMBP, and the RMP as well as the measures identified in Section 5.15 of the project AFC. The measures will be in accordance with all applicable LORS and will be implemented to protect health and safety and the environment.

Permanent Closure

The planned permanent closure will be incorporated into the facility closure plan and evaluated at the end of the generating station's economic operation. The facility closure plan will outline measures for permanent closure to secure materials and waste, including the inventory, management, and disposal of materials and wastes, and permanent closure of permitted hazardous materials and waste storage units. The permanent closure measures will be prepared as part of the facility closure plan prior to startup of the facility, and will be developed consistent with BMPs, the HMBP, and the RMP as well as the measures identified in Section 5.15 of the project AFC. The measures will be in accordance with all applicable LORS and will be implemented to protect health and safety and the environment.

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TECHNICAL AREA: WASTE MANAGEMENT

Data Adequacy Request 2: Please provide a discussion of the cumulative impacts expected from the construction, operation, and maintenance of the project, including information on available landfill capacity and comparisons of the available landfill capacity to the total volumes of nonhazardous and hazardous wastes that would be generated during project construction and operation.

Response: The project will generate non-hazardous solid waste that will add to the total waste generated in Fresno County and in California. However, there is adequate recycling and landfill capacity to dispose of the waste generated by the project as well as additional projects in Fresno County. The project will recycle the majority of the waste generated during construction and operation. The project is anticipated to generate approximately 500 tons of solid waste during construction and approximately 50 tons of solid waste annually from operations that will be sent to landfills. Fresno County reportedly landfilled 475,052 tons of solid waste in 2008 (CIWMB). Therefore, the impact of the project on solid waste disposal capacity will not be significant.

The project will generate hazardous waste that will add to the total waste generated in Fresno County and in California. Most hazardous waste that is generated by the project will be recycled. Hazardous waste treatment and disposal capacity in California is adequate to handle the hazardous waste generated by the project. Therefore the effect of the project on hazardous waste recycling, treatment and disposal capacity will not be significant.

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TECHNICAL AREA: WATER RESOURCES

Data Adequacy Request 1: Please provide a discussion of direct or indirect impacts due to construction, operation and maintenance of project.

Response: Potential, direct, indirect, and cumulative impacts due to construction, operation, and maintenance of the project were evaluated. Specifically, potential impacts to surface and groundwater supply, use, and quality were evaluated and described in the AFC section 5.5.2, Environmental Consequences.

Direct Impacts

From a surface water perspective, the Project will create new impervious surfaces that will have the potential to create additional runoff and subsequent erosion and sedimentation. To minimize potential surface water impacts, site grades will be established to minimize the amount of earthwork required to construct the facilities and to maintain control of stormwater runoff. Selected areas will be covered with appropriate material, as conditions require (e.g., asphalt concrete for road base and gravel for other facility area surfaces). Finish grading will be performed to conform to the finished design elevations for surface drainage and to prepare the areas for the specified surface finishes. Rainfall from vehicle parking and paved areas in the power block will be collected and directed to an oil/water separator prior to discharge to the raw water tank for recovery.

Rainfall from each plant's solar field will continue to be drained by sheet flow. Drainage and erosion will be controlled through implementation of appropriate post construction BMPs such as appropriately sized swales, culverts, and velocity dissipation devices. An infiltration basin will be installed at the southwest corner of the project to allow the rainfall to be absorbed into the ground replenishing local ground water levels and designed to match existing runoff rates to offsite areas. The current estimate of average annual site runoff is approximately 120 AF, assuming 7.5 inches of annual rainfall over the 640 acre site and using a runoff coefficient of 0.3. Although the Project would increase runoff coefficients in localized areas onsite (site facilities area), the Project drainage design, along with the proposed infiltration area in the southwest corner of the solar field will allow percolation and evaporation to match the current runoff rates to downstream offsite areas.

The solar field is designed with a slight berm on the exterior edges to contain collected rain water in the field for natural infiltration and evaporation. The power island is 1 foot higher than the solar field so that runoff travels to the solar fields and infiltrates or evaporates. In areas of potential HTF contamination, the runoff will be diverted to the lined evaporation pond(s).

As stated in the AFC, solely based upon comparison of the location of the Project in relation to the neighboring wells, along with the anticipated long term decline in Project reliance on groundwater, it is not anticipated that the Project groundwater usage will adversely impact groundwater levels or quality in the surrounding area. Aquifer test information for a neighboring well is submitted for reference.

The Project is designed as a "zero discharge" facility. All non-recycled wastewater streams, including the RO reject water will be contained onsite through the use of a lined evaporation pond(s). The evaporation pond will be

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sized to accommodate the wastewater amounts and will be designed in accordance with applicable state, regional, and local regulatory requirements. An onsite contained septic system will be used for sewage.

With implementation of storm drainage, erosion and sediment control design features (including implementation of an Industrial SWPPP), ultimate utilization of City wastewater for the primary water source, and recycling of all available onsite wastewater streams will result in minimization of direct project impacts on surrounding properties.

Construction Related Impacts

From a construction water use perspective, water requirements for construction will be on a temporary basis and will include primary water uses for grading/compaction, dust control, and concrete mixing. The water supply for construction will be from the existing onsite well and augmented with trucked water from offsite if needed during peak use conditions. A more detailed discussion of construction water use is provided in Water Resources Data Adequacy Response 8.

From a drainage, erosion and sediment control perspective, the project will implement a construction SWPPP that will provide BMPs for erosion, sediment, tracking, wind, non-stormwater, and waste management. Implementation of these BMPs will provide compliance with the State NPDES General Construction Permit.

Indirect Impacts

There are no identified indirect impacts related to the project that would not be mitigated by implementation of the stormwater and groundwater design features identified above.

Cumulative Impacts

As stated in the AFC, mitigation measures for the Project would be applied in situations where the Project has or would have an unmitigated significant impact. As discussed above, the evaluation of water resources impacts considered both the occurrence and the quality of water in the area. Furthermore, after implementation of the drainage, erosion and sediment control design features, water quality treatment facilities, and evaporation pond, the Project will not have a significant effect on water quality in the area or surface water runoff flowrates, volumes, or floodplain impacts.

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TECHNICAL AREA: WATER RESOURCES

Data Adequacy Request 2: Please provide figures depicting hydrogeologic conditions, groundwater bodies or related geologic structures.

Response: Figure 5.5-1 in the AFC presents the groundwater sub-basins in the vicinity of the project. Figure 5.5-5 (new figure) taken from Westlands Water District report entitled "Deep Groundwater Conditions Report," dated March 2008 (available online at: www.westlandswater.org/short/200805/525r07.pdf), presents a general hydrogeologic condition of the valley adjacent to Coalinga within the Westlands Water District. This report, available from Westlands Water District, provides general hydrogeologic conditions in the area. The project is located several miles west of the San Luis Canal as depicted on Figure 5.5-5. The existing onsite well (as currently screened) likely draws water from both the upper and lower water bearing zones. More detailed hydrogeologic conditions at the site will be provided along with the aquifer test results. Note that the project is located within the Pleasant Valley Groundwater Sub-basin and Water District (west of Westlands Water District), so the information provided in the Westlands Water District report, while informative in a general sense, may not reflect actual conditions within the Pleasant Valley Water District.

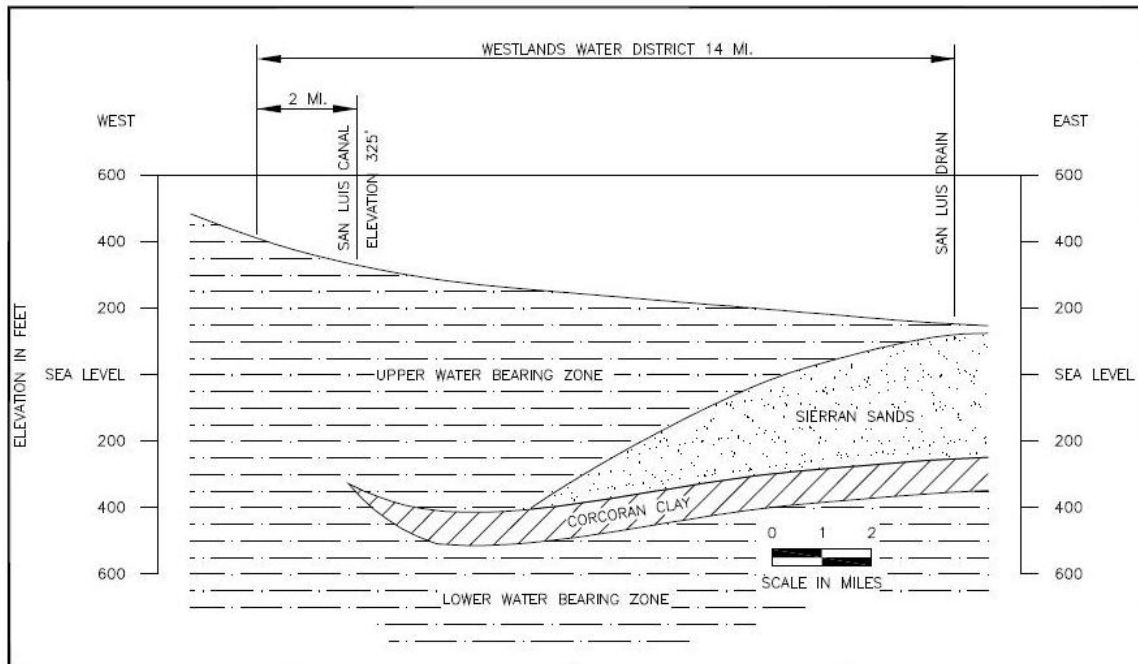


Figure 5.5-5 - General Hydrogeologic Conditions

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TECHNICAL AREA: WATER RESOURCES

Data Adequacy Request 3: Please provide aquifer testing information to support estimated well yield and drawdown estimates to evaluate potential for impact to other wells.

Response: Attached is the groundwater drawdown result from a similar well located within 1 mile of the Project's on-site well in an attempt to satisfy this data adequacy requirement. Aquifer testing information to support estimated on-site well yield and drawdown estimates will be submitted to the CEC as soon as the test results are complete and validated.

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TECHNICAL AREA: WATER RESOURCES

Data Adequacy Request 4: Please provide a discussion or figures describing nearby surface water bodies.

Response: The sub-basin boundaries for nearby streams have been derived from both hydrologic and political criteria. Several small, ephemeral streams enter the basin from the surrounding mountains; these streams include Los Gatos, Warthan, Jacalitos, Avenal, and Zapato Chino Creeks. The Project surface water drainage is tributary to Zapato Chino Creek, just south of the project as shown on USGS topographic maps of the area. Zapato Chino Creek is a FEMA mapped floodplain as shown on Figure 5.5-3 of the AFC, and it's location is also shown on a USGS map included as Figure 5.5-4 of the AFC

The Project is not located within a Federal Emergency Management Agency (FEMA) designated floodplain. The Project is within FEMA's Flood Insurance Rate Map (FIRM) Community Panel Numbers 06019C3275F, effective date July 19, 2001 and 06019C3405F, effective date July 19, 2001. The FIRMs illustrate that the Project site is entirely within Zone X, defined as areas determined to be outside the 500-year floodplain.

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Data Adequacy Request 5: Please provide a description of recycled wastewater quality.

Response: Figure 5.5-3 (Water Balance Diagram) was updated to reflect that the project will receive tertiary treated water from the City of Coalinga.

The City Wastewater Treatment Facility effluent water will ultimately be utilized as the main supply source for the project. The City wastewater will be tertiary level treated water to be supplied to the project via a pipeline and temporarily stored onsite in a holding tank prior to further onsite treatment. Because the City Wastewater Treatment Facility is not yet constructed the final operational wastewater quality from the plan is not know at this time. The water quality from the City facility will be consistent with the Waste Discharge Requirements issued by the State or Regional Water Quality Control Board for the facility. Because the City Wastewater Treatment Facility is not yet constructed and operating, actual effluent water quality data from the plant cannot be provided at this time.

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TECHNICAL AREA: WATER RESOURCES

Data Adequacy Request 6: Needs a description of post treatment water quality from both water sources.

Response:

1. The groundwater well supply leaving the Reverse Osmosis units (accepts) will have 11.25ppm TDS @ 7.7pH
2. The recycled water leaving the Tertiary Treatment System will have approximately 700ppm TDS @ 7-8pH (Used for condenser cooling)
3. Water to be recycled onsite will pass through the 'tertiary treatment system' (to treat water received from the City Wastewater Plan). All of the water to be recycled goes to the "Secondary Gray Water Receiving Tank" and is fed to the Tertiary Treatment System". (See Figure 5.5-3)

The water to be recycled will be:

- | | |
|--|-------------------------|
| 1. Steam System Blowdown | 1000ppm TDS @ 8.5-9.5pH |
| 2. Cooling Tower Blowdown | 4,950ppm TDS @ 7-8pH |
| 3. RO System Rejects | 5,150ppm TDS @ 7-8pH |
| 4. Gray Water from Coalinga | 500-1000ppm TDS @ 7.5pH |
| 5. Water from Control Room,
Offices sinks, sample coolers | 250ppm TDS @ 7pH |

The Tertiary Treatment System cleans the recycled water listed above to produce recycled water quality of approximately 700ppm TDS @ 7-8pH.

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TECHNICAL AREA: WATER RESOURCES

Data Adequacy Request 7: Needs a description of water quality proposed for discharge to the evaporation ponds.

Response: Based upon the current design assumptions and onsite treatment system design, the water going to the evaporation pond (Tertiary Treatment System Rejects) will have approximately 7,000ppm @ 7-8pH.

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TECHNICAL AREA: WATER RESOURCES

Data Adequacy Request 8: Please provide a description of construction water use.

Response: During the first two to three months of the project the largest quantity of construction water will be required. This water will be used for compaction and dust suppression for the cut and fill required to create the three terraces of SJS 1&2. It is estimated that 150,000 to 200,000 gallons per week will be required to perform this activity (15 to 20 gallons per minute [gpm] assuming constant groundwater pumping).

After the initial grading is completed on the project, approximately 50,000 gallons of water a week (15 gpm) will continue to be used for dust suppression. In addition to this another 50,000 to 75,000 gallons per week (5 to 7.5 gpm) will be used in a concrete batch plant during the six months of civil work.

Finally about 2,000 gallons per week (2 gpm) will be used for construction clean-up purposes (i.e. equipment cleaning, personnel clean up etc).

It is assumed that bottled or trucked potable water will be used during construction.

With these various requirements, it is estimated that the maximum water use during construction would be approximately 25 gpm. Daily water usage rates in gallons per minute would likely exceed this rate, but based upon an average daily basis this rate would be less than during long term operations.

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TECHNICAL AREA: WATER RESOURCES

Data Adequacy Request 9: Please provide a description of design storm. Need storm water collection system design, storm water collection system description and storm water collection system diagrams.

Response: The onsite stormwater conveyance systems will be designed in accordance with the Fresno County drainage standards for swales, pipes, infiltration basins, etc. Fresno County has a draft hydrology/hydraulic design manual that will be utilized to design and protect facilities from damage from 100-year flooding.

The currently proposed design will sheet flow accumulated runoff through each of the four main pad areas. Flows may be concentrated at select locations including: roadside swales, road cross culverts, terrace downdrains, and at the entrance to the infiltration area in the southwest corner of the site. The infiltration area will be designed to accept and infiltrate annual runoff volumes to reduce post project flows to at or below existing levels. Accumulated runoff that cannot be stored and infiltrated will be discharged out of the basin in a controlled method to prevent erosion at the outlet and receiving water. Figure 5.5-6 (shown below) shows the general pad grades (610 feet in the northeast quadrant, 590 in the northwest quadrant, 590 in the powerblock area, 569 in the southeast and southwest quadrants, and 567 within the southwestern infiltration area), general flow directions and location of the infiltration area in the southwest corner of the site.

As indicated in the AFC, site grades will be established to minimize the amount of earthwork required to construct the facilities and to maintain control of stormwater runoff. All areas disturbed during construction will be graded to a smooth surface. Selected areas will be covered with appropriate material, as conditions require (e.g., asphalt concrete for road base and gravel for other facility area surfaces). Finish grading will be performed to conform to the finished design elevations for surface drainage and to prepare the areas for the specified surface finishes. Rainfall from vehicle parking and paved areas in the power block will be collected and directed to an oil/water separator prior to discharge to the raw water tank for recovery.

Rainfall from each plant's solar field will continue to be drained by sheet flow. Drainage and erosion will be controlled through infiltration basins to allow the rainfall to be absorbed into the ground replenishing local ground water levels and designed to match existing runoff rates to offsite areas. The current estimate of average annual site runoff is approximately 120 acre-feet (AF), assuming 7.5 inches of annual rainfall over the 640 acre site and using a runoff coefficient of 0.3. Although the Project would increase runoff coefficients in localized areas onsite (site facilities area), the Project drainage design, along with the proposed infiltration areas in the solar field will allow percolation and evaporation to match the current runoff rates to downstream offsite areas.

The solar field is designed with a slight berm on the exterior edges to contain collected rain water in the field for natural infiltration and evaporation. The power island is 1 foot higher than the solar field so that runoff travels to the solar fields and infiltrates or evaporates. In areas of potential HTF contamination, the runoff will be diverted to the lined evaporation pond(s).

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The project will comply with the applicable Fresno County drainage and flood control policies including the following Fresno County Flood Control Policies:

- Policy PF-E.5: The County shall only approve land use-related projects that will not render inoperative any existing canal, encroach upon natural channels, and/or restrict natural channels in such a way as to increase potential flooding damage.
- Policy PF-E.6: The County shall require that drainage facilities be installed concurrently with and as a condition of development activity to ensure the protection of the new improvements as well as existing development that might exist within the watershed.
- Policy PF-E.7: The County shall require new development to pay its fair share of the costs of Fresno County storm drainage and flood control improvements within unincorporated areas.
- Policy PF-E.9: The County shall require new development to provide protection from the 100-year flood as a minimum.
- Policy PF-E.11: The County shall encourage project designs that minimize drainage concentrations and maintain, to the extent feasible, natural site drainage patterns.
- Policy PF-E.13: The County shall encourage the use of natural storm water drainage systems to preserve and enhance natural drainage features.
- Policy PF-E.14: The County shall encourage the use of retention-recharge basins for the conservation of water and the recharging of the groundwater supply.
- Policy PF-E.21: The County shall require the use of feasible and practical best management practices (BMPs) to protect streams from the adverse effects of construction activities, and shall encourage the urban storm drainage systems and agricultural activities to use BMPs.

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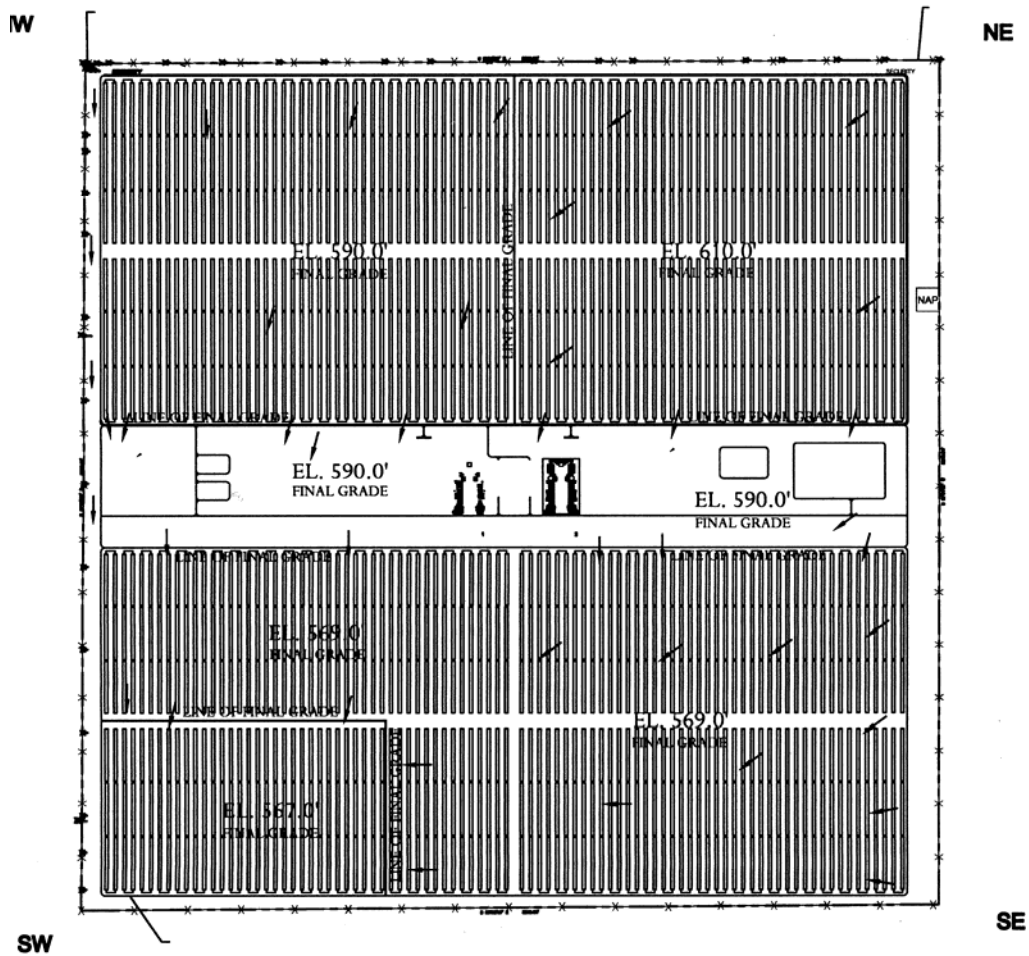


FIGURE 5.5-6 - GENERAL SITE GRADING

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TECHNICAL AREA: WATER RESOURCES

Data Adequacy Request 10: Please provide all assumptions and calculations used to calculate runoff and to estimate changes in flow rates between pre- and post construction

Response: The current estimate of average annual site runoff is approximately 120 acre-feet (AF), assuming 7.5 inches of annual rainfall over the 640 acre site and using a runoff coefficient of 0.3. Although the Project would increase runoff coefficients in localized areas onsite (site facilities area), the Project drainage design, along with the proposed infiltration areas in the solar field will allow percolation and evaporation to match the current runoff rates to downstream offsite areas. A post construction runoff coefficient estimate of 0.35 to 0.40 is anticipated. This would result in a total average runoff volume of 160 acre feet. This would require a 40 acre feet of storage to reduce runoff volume to existing conditions. The proposed infiltration area in the southwest corner of the site provides approximately 60-80 acre feet of storage which should be adequate to detain or infiltrate the increase in runoff volume. The runoff coefficients were assumed based upon general coefficients for agricultural land and adjusted upward for post project condition based upon anticipated grading and facility construction.

Additional calculations will be provided during further site development to analyze drainage and flooding conditions up through the 100-year storm to ensure continued site access and function. The site will be designed to ensure no adverse flooding impacts to adjacent properties.

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TECHNICAL AREA: WATER RESOURCES

Data Adequacy Request 11: Please provide a copy of applicable regional and local requirements regulating the drainage systems, and a discussion of how the project's drainage design complies with these requirements

Response: Fresno County has general policies regarding drainage and flood control. They also have draft drainage design standards. The project will be designed in accordance with these standards along with applicable Basin Plan requirements. Data Adequacy Request Response #9 within the Water Resources Technical Area provides Fresno County flood control policies.

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TECHNICAL AREA: WATER RESOURCES

Data Adequacy Request 12: Please provide an impacts analysis of the proposed project on water resources and a discussion of conformance with water-related LORS and policy including the effects of project demand on the water supply and other users of these sources, including, but not limited to, water availability for other uses during construction or after the power plant begins operation, consistency of the water use with applicable RWQCB basin plans or other applicable resource management plans, and any changes in the physical or chemical conditions of existing water supplies as a result of water use by the power plant

Response: The impacts analysis is provided in the AFC Sections 5.5.2 and 5.5.3 and also in response to Water Resources Data Adequacy Response 1. Discussion of compliance with LORS is provided in AFC Section 5.5.4.

Impacts analysis related to additional groundwater well yield/testing information will be provided when available. Estimated water quality information is provided in Data Adequacy Responses 5 through 8 within the Water Resources Technical Area.

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TECHNICAL AREA: WATER RESOURCES

Data Adequacy Request 13: Please provide an estimation of aquifer drawdown based on a computer modeling study that shall be conducted by a professional geologist and discuss any effects on the migration of groundwater contaminants, and the likelihood of any changes in existing physical or chemical conditions of groundwater resources

Response: Submission of the neighboring well aquifer test information (attached) should satisfy the data adequacy need for groundwater well yield/aquifer analysis. Results of the onsite well aquifer information will be provided when available.

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TECHNICAL AREA: WATER RESOURCES

Data Adequacy Request 14: Please provide a table or matrix that explicitly references pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed

Response:

**Table 5.5-8 (Revised)
Summary of LORS**

Jurisdiction	LORS	Requirements	Conformance Section	Administering Agency	AFC Page Number
Federal					
	CWA § 402; 33 USC § 1342; 40 CFR Parts 110, 112, 116	Requires NPDES Permits for construction and industrial stormwater discharges. Requires preparation of a SWPPP and Monitoring Program.	Coverage under NPDES industrial stormwater permit maybe required. NOI for coverage under NPDES construction stormwater permit will be filed prior to construction.	SWRCB and RWQCB	5.5-15
	CWA § 311; 33 USC § 1342; 40 CFR Parts 122-136	Requires reporting of any prohibited discharge of oil or hazardous substance.	Project will conform by proper management of oils and hazardous substances both during construction and operation. If an accidental release or unintended spill occurs it will promptly be reported.	RWQCB and DTSC	5.5-16
	Code of Federal Regulations (CFR), Title 40, Parts 124, 144 to 147	Requires protection of underground water resources	Project will utilize lined evaporation ponds for wastewater disposal.	Environmental Protection Agency (EPA)	5.5-16
State					
	CWC § 13552.6	Use of potable domestic water for cooling towers and air conditioning is unreasonable use if suitable recycled water is available.	The Project proposes to use recycled wastewater as a main water supply source.	SWRCB and RWQCB	5.5-16, 17, 18

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Jurisdiction	LORS	Requirements	Conformance Section	Administering Agency	AFC Page Number
	California Constitution Article 10 § 2	Avoid the waste or unreasonable uses of water. Regulates methods of use and diversion of water.	Project includes appropriate water conservation measures, both during construction and operation.	SWRCB and RWQCB	5.5-16, 17, 18
	State Water Resources Control Board, Resolution No. 75-58	Addresses sources and use of cooling water supplies for power plants which depend on inland waters for cooling and in areas subject to general water shortages.	The Project proposes to use recycled wastewater as a main water supply source.	SWRCB and RWQCB	5.5-16
	Porter-Cologne Water Quality Act of 1972; CWC § 13000-14957, Division 7, Water Quality	Requires State and Regional Water Quality Control Boards to adopt water quality initiatives to protect state waters. Those criteria include identification of beneficial uses, narrative and numerical water quality standards.	Project will conform to applicable state water standards, both qualitative and quantitative, prior to and during operation. Applicable permits will be obtained from Regional Water Quality Control Board.	SWRCB and RWQCB	5.5-15, 16
	Title 22, CCR	Addresses the use of recycled water for cooling equipment	The Project proposes to use recycled wastewater as a main water supply source.	California Department of Health Services	5.5-16
	The Safe Drinking Water and Toxic Enforcement Act of 1986 (proposition 65), Health and Safety Code 25241.5 et seq.	Prohibits the discharge or release of chemicals known to cause cancer or reproductive toxicity into drinking water sources.	The Project will conform to all state water quality standards, both qualitative and quantitative. The Project will not discharge into any drinking water source. If an unintended spill occurs, reporting of spill will be prompt.	California Department of Health Services	5.5-17

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Jurisdiction	LORS	Requirements	Conformance Section	Administering Agency	AFC Page Number
	CWC Section 461	Encourages the conservation of water resources and the maximum reuse of wastewater, particularly in areas where water is in short supply.	The Project proposes to use recycled wastewater as a main water supply source.	SWRCB and RWQCB	5.5-16-18
	CWC Section 5002	Requires a "Notice of Extraction and Diversion of Water" to be filed with the State Water Resources Control Board on or before March 1st of the succeeding year.	Notice will be filed as required by state law.	SWRCB and RWQCB	5.5-16-18
	CWC Section 13751	Requires a "Report of Completion" to be filed with the State Water Resources Control Board within 60 days of well construction.	If a new well is required, the Project will file a report of well completion.	SWRCB and RWQCB	5.5-16-18
	California Public Resources Code § 25523(a); 20 CCR §§ 1752, 1752.5, 2300 – 2309, and Chapter 2 Subchapter 5, Article 1, Appendix B, Part (1)	The code provides for the inclusion of requirements in CEC's decision on an AFC to assure protection of environmental quality, and requires submission of information to the CEC concerning proposed water resources and water quality protection.	The Project will comply with CEC requirements to assure protection of water resources.	CEC and RWQCB	5.5-16-18
	CWC §§ 13271 – 13272; 23 CCR §§ 2250 – 2260	Reporting of releases of reportable quantities of hazardous substances or sewage and releases of specified quantities of oil or petroleum products.	No releases of hazardous substances are anticipated; however, the Project will conform to all state water quality standards, both qualitative and quantitative. If an unintended spill occurs, reporting of spill will be prompt.	SWRCB and RWQCB	5.5-16-18

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Jurisdiction	LORS	Requirements	Conformance Section	Administering Agency	AFC Page Number
	CWC §13260 – 13269; 23 CCR Chapter 9	Requires the filing of a Report of Waste Discharge (ROWD) and provides for the issuance of WDRs with respect to the discharge of any waste that can affect the quality of the waters of the state.	RWQCB will be contacted regarding the requirements for an ROWD and WDRs	SWRCB and RWQCB	5.5-16-18
	CEQA, Public Resources Code § 21000 et seq.; CEQA Guidelines, 14 CCR § 15000 et seq.; Appendix G	CEQA Guidelines (Appendix G) contain definitions of projects which can be considered to cause significant impacts to water resources.	The Project will comply with the requirements of the CEC to assure protection of water resources.	CEC	5.5-16-18
	Title 27, CCR Division 2. §20375. SWRCB - Special Requirements for Surface Impoundments. (C15: §2548)	This regulation governs the design requirements for surface impoundments.	The evaporation pond for process wastewater disposal will be designed and operated in accordance with the requirements of this section.	SWRCB and RWQCB	5.5-16-18
Local					
	Fresno County Department of Community Health, Environmental Health System, California Well Standards Ordinance and California Well Standards, Bulletins 74-81 and 74-90.	Regulates construction of new water wells, reconstruction, repair or deepening of existing wells and destruction of abandoned wells.	The Project will conform to all Fresno County water well construction standards.		5.5-18

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Jurisdiction	LORS	Requirements	Conformance Section	Administering Agency	AFC Page Number
	Fresno County General Plan Water Quality Policies and Programs.	Non-point sources of water pollution, such as runoff from urban areas, grading, construction, and agricultural activities shall be recognized as potentially significant impacts of development.	The Project will conform to all water quality policies and programs, and will have zero discharge off-site from industrial activities. Grading and erosion control plans will minimize or prevent construction phase impacts.		5.5-18

Notes:

LORS = laws, ordinances, regulations, and standards

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ATTACHMENTS:

Figure 4.2-2, Revised
Biological Technical Report
Correspondence with CDFG and USFWS
Figure 3.4-2a
Figure 5.4-2
Figure 3.4-11
Figure 3.4-12
Figure 3.4-6, Revised
CAISO Confirmation of Project Name
CAISO Bethel Energy to BSP Consent to Assignment
CAISO Bethel to Martifer Consent to Assignment
Figure 5.5-3, Revised
SJS 1&2 Anticipated Well Performance